



Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at <http://about.jstor.org/participate-jstor/individuals/early-journal-content>.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact support@jstor.org.

chased, or was furnished with ready money with which to pay cash for them. A note to this case reviews the other authorities on the liability of a husband for necessities furnished his wife while living with him.

CONSTITUTIONAL LAW—CONTRACTS—PAYMENT OF EMPLOYEES IN STORE ORDERS—VA. CODE 1904, SEC. 3657 D.—A statute similar to the Virginia Act, forbidding, under penalty, persons or corporations engaged in private enterprises from paying employees in store orders not redeemable in cash is held, in *State v. Missouri Tie & T. Co* (Mo.), 65 L. R. A. 588, to be unconstitutional as interfering with the right to contract.

CONSTITUTIONAL LAW—RIGHT OF TRIAL BY JURY—CHANGE OF VENUE—CF. SEC. 4036, VA. CODE 1904.—A statute which provides for a change of place of trial to another county, upon the application of the State's attorney, when a fair and impartial trial cannot be had in the original county, is held, in *Barry v. Truax* (N. D.), 65 L. R. A. 762, not to be invalid as a deprivation of the constitutional right of trial by jury. The same question may be raised under the Virginia statute above mentioned.

PERSONAL INJURY—NEGLIGENT DESTRUCTION OF SIGHT OF PUPIL BY TEACHER.—A teacher who threw a pencil at a pupil to attract his attention is held, in *Drum v. Miller* (N. C.), 65 L. R. A. 890, to be liable for the destruction thereby of the sight of the pupil, if he did not act with ordinary care, and the injury was the natural and probable result of his negligence. The other authorities on liability of school teacher for personal injury to pupil are collated in a note to this case.

UNFAIR COMPETITION.—The use upon bottles containing water from the Saratoga spring of a label in which the word "Saratoga" is made inconspicuous, and the word "Vichy" prominent, so that when the bottles are standing on a table or shelf the word "Vichy" is the prominent object of sight, is held, in *La Republique Francaise v. Saratoga Vichy Springs Co.* (C. C. A. 2d C.), 65 L. R. A. 830, to be unfair competition with bottled waters from the commune of Vichy, in France, which had long been upon the market under that name. See, also, 10 Va. Law Reg. 359, 552.

LARCENY BY HUSBAND AND WIFE—EFFECT OF MARRIED WOMAN'S LAW—SEC. 2286 A, VA. CODE 1904.—That a man may be guilty of larceny of property which the Constitution makes the sole and separate property of his wife is decided in *Hunt v. State* (Ark.), 65 L. R. A. 71. As at common law, husband and wife were one and "that one was the husband," neither husband nor wife could be guilty of larceny of the other's property. "But a third person may be convicted of larceny of community property, notwithstanding the wife consents to the taking, where she consented to have it taken with the felonious intention of depriving her husband of it. *People v. Swalm*, 80 Cal. 46, 13 Am. St. Rep. 96, 22 Pac. 67. One who has committed or intends to commit adultery with another's wife may be convicted of larceny if he feloniously takes the husband's